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FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
1998 Biennial Regulatory Review -- ) MM Docket No. 98-43  
Streamlining of Mass Media )  
Applications, Rules, and Processes )

To: The Commission

**COMMENTS OF THE FEDERAL COMMUNICATIONS BAR ASSOCIATION**

The Federal Communications  
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## Summary

The FCBA comments upon the Commission's streamlining proposals, supporting the Commission in its effort to expedite application processing. The FCBA notes, however, that several proposed changes may have unintended negative public interest ramifications.

The FCBA supports an electronic filing procedure, and encourages the Commission to adopt an open system that will not require the use of any proprietary computer platform or software. For electronic filing, the FCBA suggests application filing confirmation procedures, filer verification procedures, and an expedited release of public notices. The FCBA suggests that the Commission be careful not to force an applicant into the troublesome position of answering only "yes" or "no" to application questions when perhaps an answer of "maybe" with a narrative exhibit would be more accurate.

The FCBA suggests that the application filer be required to use a previously issued password from the Commission in order to prevent unauthorized submissions and to enable the Commission to verify the identity of the filer. The FCBA supports the retention and signing of application worksheets by applicants, and the filing of these worksheets, sales agreements, multiple ownership studies and other application supporting information in an applicant's local public file, and in a location to be contracted for by the FCC that is not part of the FCC but is accessible to the public in Washington, D.C.

The FCBA believes that the collection of sales price information on broadcast transactions serves broad public interest goals in that many broadcast station loans to small businesses, minorities, start-up companies and women would not have been made absent the universal availability of this data. Finally, the FCBA encourages the Commission to adopt a strong enforcement policy where electronically filed applications are frequently subject to full audits.

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The Federal Communications Bar Association ("FCBA"),<sup>1/</sup> pursuant to Section 1.415 of the Commission's Rules, hereby submits these Comments in response to the Commission's Notice of Proposed Rule Making ("Streamlining NPRM") in the above-captioned proceeding. In the Streamlining NPRM, the Commission puts forth a number of innovative and exciting proposals which constitute a material change in the way that broadcast station applications will be filed and processed by the FCC in the future. The FCBA either concurs with, or offers no comment upon, most of the

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<sup>1/</sup> The FCBA is a non-profit, non-stock corporation organized under the laws of the District of Columbia, and has been in existence since 1936. The FCBA's membership consists of over 3,200 attorneys and other professionals involved in the development, interpretation and practice of communications law and policy. These comments were prepared by an appointed sub-committee of the Mass Media Practice Committee and approved by the FCBA's Executive Committee, its elected board of directors. As in the case of other comments filed on behalf of the FCBA, the views expressed in these comments do not necessarily reflect the views of each and every FCBA member. No FCBA members who are employees of the FCC participated in the preparation of these comments. In addition, one member of the Executive Committee, who is an employee of the FCC, did not participate in the Committee's discussion or consideration of these comments or in the vote to authorize their filing.

changes.<sup>2/</sup> The FCBA believes that several procedural changes, however, may substantially affect the ability of its members to best represent their clients. Further, several of the proposed procedural changes may have broad unintended negative public interest ramifications. These comments are therefore submitted to suggest ways in which the Commission's streamlining goals may be realized while at the same time not harming the public interest.

### Introduction.

1. The FCBA's comments will restrict themselves to the following aspects of the Commission's Streamlining NPRM: (1) electronic filing; (2) certification of electronically filed applications; (3) retention of application worksheets; (4) filing of sales agreements and other supporting documentation with the FCC; and (5) enforcement and audits.

2. The members of the FCBA, many of them practicing lawyers, have collectively filed thousands of applications for their clients. Perhaps better than anyone, FCBA members are in a position to comment upon the practical aspects of the Commission's procedural proposals in the Streamlining NPRM. The FCBA supports the Commission's desire to process applications more efficiently with fewer government resources being used. This is a laudable goal. The FCBA notes that in the vast majority of cases, application processing should be routine and applicants before the FCC should have an expectation of expeditious action

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<sup>2/</sup> The FCBA's comments are focused upon the Commission's procedural changes to its rules and practices.

on submitted applications. Each of the foregoing comments of the FCBA are designed to support these important Commission goals.

3. At the same time, however, FCC application processing cannot simply be a system of "rubber stamping" engaged in for the sole purpose of "granting" applications. It would be a disservice to the public if the Commission was to simply grant applications without regard to substantive compliance with Commission rules. Therefore, the FCBA takes issue with several of the Commission's proposals which it believes will diminish, rather than enhance, the Commission's ability to be certain that its rules are followed by all applicants. Indeed, no applicant or licensee before the FCC should be put into the position of believing that the FCC does not care about enforcing its rules and therefore does not care about the underlying facts behind the answers on an application form as long as the appropriate certification box is checked.

#### **Electronic Filing.**

4. The Commission as an initial matter seeks comment upon whether it should require the mandatory electronic filing of 15 widely used Mass Media Bureau applications. As a general matter, the FCBA wholeheartedly supports the Commission's goal toward enabling the electronic filing of applications. To put it bluntly, for far too long too many trees have been felled by the Commission's requirements that multiple paper copies of multi-page applications be filed.

5. In establishing a system of electronic filing, however, the Commission should endeavor to be certain that the ability to

electronically file applications is available through as many computer platforms and through as many varieties of computer software as possible. Neither the public nor the members of the FCBA should be locked into any particular computer brand, software or operating system. To the greatest extent possible, the process of filing a Mass Media Bureau application should be available to anyone who has a computer that is able to access the World Wide Web.

6. Indeed, this is where the Commission's Mass Media Bureau procedures for application submission should not follow in the footsteps of previous Commission procedures for electronic filing. Too often in the past, Commission procedures for electronic filing have required specific computer platforms (i.e. Microsoft Windows 3.1), or specific data transmission protocols (i.e. a "Winsock" connection) that resulted in the computer being unable to be used for any other data connections while the FCC's software was installed. While this type of software undeniably works, it also has the effect of contracting, rather than expanding, the number of possible users, and makes doing business with the government in many respects more burdensome.

7. The World Wide Web is approaching a level of maturity, both with browser software and ubiquity, that application submission through the World Wide Web would appear to be the procedure most in the public interest. The newest web browsers, Netscape's Communicator 4.0 and Microsoft's Explorer 4.0, have matured to the point that data may safely be transmitted through the web through encryption methods without fear of interception. Fur-

ther, both programs are easy to use and work on a variety of different computer platforms utilizing a variety of different operating systems.

8. The Commission should be particularly careful about choosing any system of electronic filing that favors any computer manufacturer's proprietary operating system. By allowing information to be submitted through standardized World Wide Web browsers using standardized protocols, the Commission will not be in the position of requiring that a certain operating system be used in order to seek Commission approval of applications.

9. With respect to changing over to a system of electronic filing, the FCBA submits that electronic filing should not be mandatory until such time as Commission software and procedures have reached a state where all known bugs have been worked out of the filing process. It is difficult to estimate now whether that will take 12 months, 18 months or longer. In no event should electronic filing be mandatory less than 12 months after the Commission institutes the new procedures.

10. The FCBA believes that a longer time period for phasing in electronic filing, perhaps 24 months, would be more in the public interest, as it would allow both lawyers and the public to plan for and implement capital improvements to their computer facilities with a view toward using the Commission's new electronic filing procedures, and to train the necessary personnel to utilize these procedures. No one appearing before the FCC should be rushed into a technological change in application filing procedures with the resultant possibility of applications being

refused or lost until such time as the Commission has worked all bugs out of its system, and until such time as lawyers and the public have had a chance to appropriately plan for and implement whatever software procedures are adopted by the Commission.

While many in the bar and in the industry are proficient in the use of computer technology, there are unfortunately many who are still unable or unwilling, for a variety of reasons, to use that technology.<sup>3/</sup> The Commission should give adequate warning of its conversion to a mandatory electronic filing procedure, for those unschooled in the use of computer technology to have the time to make the conversion or to find someone who can assist them when the use of such technology is mandatory.

11. Of prime importance to the applicant in any electronic filing procedure will be the ability to immediately confirm that application information has been properly received by the FCC as the result of the application filing procedure. The application filer should not be subject to a procedure where a "send" button is pushed on the computer, and the application filer thereafter does not immediately have both a confirmation of the receipt of the application by the Commission, and a copy of that application

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<sup>3/</sup> While most if not all attorneys now rely on computer technology in their offices, the FCBA notes that there are still many small broadcasters who have not yet adopted such technology. In fact, there are still a few broadcast licensees who still do not have fax machines must less e-mail capacity. And these are the licensees most likely, for financial and other reasons, not to use lawyers in the preparation of their applications. The Commission must give additional time to such licensees to adopt new technology, or else they will become perhaps more alienated from the regulatory process than they already are.

transmitted back to the applicant showing that the applicant's responses were accurately received by the Commission.

12. This verification procedure is necessary for several reasons. First of all, there is nothing more frustrating to a computer user than sending a document electronically without knowledge of whether the document indeed makes its way to the recipient. As important, however, the applicant filer should have a copy of the application responses immediately transmitted back to the applicant. In this way, the applicant can contemporaneously review the answers transmitted to the Commission to insure that the transmission was accurate and complete.

13. Another aspect of electronic filing for Mass Media Bureau applications should be that an applicant has the ability to immediately correct or modify application answers electronically. To be able to submit an application electronically, but to have the need for amendments and supplements to be submitted in paper form would be only one-half of an electronic filing system. Whatever system is put into place by the Commission should have the ability to accept both amendments and modifications to applications electronically.

14. Additionally, the application form itself should provide the opportunity for an applicant to explain either a "yes" or a "no" answer with the submission of a narrative exhibit to the application. While it is recognized that the submission of such a narrative exhibit may slow down the processing of such an application, no applicant should be put in the position of being forced to answer only "yes" or "no" to a question that perhaps

merits the response in the applicant's situation of "maybe". Thus, for most application responses, the electronic filing procedures should allow for narrative exhibits which explain or clarify answers to be appended or included.

15. Finally, in order to bring greater benefits to the public from this system of electronic filing, applicants should be able to expect that applications filed electronically requiring public notice will be placed on such public notice by the Commission within one to two business days after an application is filed with the Commission. With paper filing procedures, applicants now routinely wait between 7 and 15 days for applications to be placed upon the public notice, to commence the 30-day time period which the Commission by statute must allow to elapse prior to taking any action on many applications. This 7 to 15 days wait is a major delay in application processing. It should be eliminated as a part of any electronic filing procedure. The FCBA submits that if applications filed electronically were placed on public notice within one to two business days after filing, that change in itself would be a great inducement for members of the FCBA and the general public to use the Commission's electronic application filing procedures sooner rather than later.

#### **Certification of Electronically Filed Applications.**

16. The Commission now proposes the use of Taxpayer Identification Numbers ("TIN") to be used to identify applicants. The Commission notes that its electronic filing system would be designed so that TINs would not be available to the public. Yet,

the use of TINs is so widespread by Commission licensees and applicants that a TIN, in itself, provides no assurance that the identified entity is indeed filing the application in question.

17. The FCBA is concerned that absent some more formalized means of applicant authorization, the Commission will be faced with either claims by applicants that an application in question was unauthorized or, applications may be filed by persons not authorized to "sign" such applications on behalf of filers. The present paper forms the Commission uses requires that an original signature be affixed to the application pursuant to Section 73.3513 of the Commission's rules. This original signature requirement has served the Commission well. The FCBA is aware of few instances where either an applicant has claimed that an application was unauthorized, or in the alternative, an application is filed by one not authorized to do so.<sup>4/</sup> However, even where an original signature is required, there have been instances where such unauthorized applications have been submitted. Total elimination of the signature requirement might lead to even a greater number of such unauthorized filings.

18. In addition to the requirement to submit a TIN, the Commission should require a unique password for each individual submitting an application (or in the case of assignment or transfer application, each portion of an application). This password would be assigned by the Commission to an individual applicant,

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<sup>4/</sup> The FCBA does note, however, knowledge of frequent circumstances where routine forms such as ownership reports and annual EEO reports have been signed by those other than corporate officers authorized to sign such forms.

an applicant's general partner, officer or managing member, or to an applicant's lawyer. In the case of an assignment or transfer application, both the assignor/transferor and the assignee/transferee should be required to submit a password.<sup>5/</sup>

19. In the case of an application being filed by a lawyer, the lawyer should be required to maintain in his or her files a copy of the application as filed showing the original signature of all required signatories to the application, and have that originally signed application available to the Commission upon request. The filing of an application by a lawyer should be a certification that the lawyer has in his or her files such original signatures.

20. By requiring that the filer of any electronically filed application submit a unique password, the integrity of the Commission's processes may be maintained. In the case of an application filed by an individual, that individual himself or herself should be required to submit a password. In the case of an application being filed by the authorized official of an entity, that authorized official should be required to have a unique password. In the case of an application being filed on behalf of

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<sup>5/</sup> The assignment of the initial password would require some verification procedure by the Commission which would most likely involve a paper filing. Once this paper filing is made giving the name, address, phone number, and ink signature of the person seeking the password, thereafter all filings could be done electronically. The first time a password is assigned to an individual authorized to sign an application or to a lawyer, the paper verification should have that individual or lawyer attest that he or she will protect the integrity of the password, notify the Commission immediately upon learning of any misuse, and provide evidence to the Commission by the filing of an affidavit that such individual or lawyer is who he or she states himself or herself to be.

a person or an entity by its, his or her lawyer, that lawyer should be required to have a unique password, and maintain a signed paper copy of the application in his or her files.

**Retention of Worksheets.**

21. The Commission anticipates reformatting its application to seek "yes" or "no" answers to most application questions, and to require applicants to prepare worksheets to determine the appropriate answer to application questions. The Commission seeks comments on whether it should require applicants and licensees to retain such worksheets and further, whether applicants and licensees should be required to place such worksheets in their public inspection files.

22. The FCBA emphatically believes that applicants and licensees should not only be required to retain such worksheets and place them in their public inspection files, but further an applicant should identify on each worksheet with a signature and date the person preparing such worksheet and the signature of the person responsible for the filing the application as to a review of the worksheet, in the event a question is later raised. The integrity of the Commission's processes will depend on the accurate and studied use of the proposed worksheets by applicants.

23. Since applicants will be responsible for each portion of their application, the Commission's processes would be irreparably harmed if an applicant could simply respond to a question being raised with respect to its application by stating "it was only a typographical error". Unless worksheets are signed by applicants, placed in public inspection files and maintained for

later inspection, the Commission will never be able to question the integrity of an applicant in submitting a certain answer as an applicant can always answer that it was merely a typographical error.<sup>6/</sup>

**Filing of Sales Agreements and Other Supporting Information with the FCC.**

24. The Commission proposes that sales agreements shall no longer be required to be filed as part of an assignment or transfer application, and seeks the public's comment on this proposal. While the FCBA understands the Commission's motivations in making this proposal, it is concerned that eliminating the filing of the sales agreement with the FCC negates many of the public interest benefits that accrue from such a filing.

25. The Commission asks if making this sales agreement available in an applicant's public inspection file suffices for the purpose of the public's oversight responsibilities. The FCBA submits that it does not and suggests a supplementary procedure. Prior to describing this supplementary procedure, however, the FCBA wishes to point out the important public interest role that Commission licensees, the public, and their lawyers play in assisting the FCC in its regulatory oversight. Indeed, the FCBA submits that the FCC could not do the job that it is expected to do in regulating the communications industry without the oversight of the industry and its lawyers. Because the Commission is located in Washington, D.C. a large majority of the lawyers who

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<sup>6/</sup> As noted below, the FCBA also believes that these worksheets should be filed at a location in Washington, D.C. This concept is explained in more detail at paragraphs 24 through 35, below.

practice before it, particularly those who represent mass media entities, are also located in Washington, D.C. These lawyers, most of who are members of the FCBA, have relied upon the Commission's public reference room to supply vital information regarding pending and granted applications.

26. If the Commission is now to require applicants to place this vital information instead into a station's or applicant's local public inspection file rather than in Washington, D.C., this vital role of oversight played by licensees, the public and their lawyers will be hindered or curtailed. And, the burden on the public to participate in the oversight of the FCC's regulatees will be greatly increased. All documents now supporting Mass Media Bureau applications are located in one place -- the FCC's public reference room. The Commission proposes spreading those documents across the country in thousands of different locations. Up until now an applicant, a licensee, a lawyer or a member of the public could rely upon traveling to one location to search for information on any number of FCC applicants and licensees.

27. In the future, that same applicant, licensee, member of the public or lawyer will have to travel to, or hire someone to travel to, multiple locations. The cost and expense of such travel and information retrieval will necessarily result in less oversight of Commission applicants and licensees. And this in turn will increase the Commission's workload as it will have to take on the burden of policing applicants where the public now does so. The Commission should not in its electronic filing

procedures inadvertently increase its workload by eliminating the important public oversight that takes place with respect to the applications filed before it.

28. In order to allow the public to maintain its oversight of applications filed with the Commission, the Commission should establish in its electronic filing procedures that a copy of all supplementary material to an application, including the sales agreement and all worksheets as signed by the applicant, be filed with an independent contractor in Washington, D.C., whose fees shall be paid by the public seeking to obtain copies of such filings. As the Commission does now with independent contractors who make copies of documents available in the Commission's public reference room, the Commission should follow its normal bid procedures to specify from time-to-time the contractor who will be responsible for receiving, warehousing and making available to the public such filings at the Commission for a fee similar to the per copy charge now charged by such contractors for making available copies of Commission documents from the Commission's public reference rooms.

29. The burden on applicants and licensees of placing in their local public files and submitting to the Commission's contractor a copy of the sales agreement, worksheets and supplemental materials to the applications is not substantially greater than the burden of requiring applicants and licensees to place such materials in local public files. The Commission can provide that such materials may be submitted to the contractor in Washington, D.C. by regular mail. In order to assure that applicants

and licensees do indeed submit such information to both the local public file and to the contractor in Washington, D.C., the Commission should provide that it will not take any action on an application where an allegation is made that such material is not available in either a licensee's local public file or through the contractor in Washington, D.C. at least five business days after the electronic filing of an application.<sup>2/</sup>

30. The Commission specifically asks if its proposed procedures are sufficient to permit the public to monitor station transactions. The public cannot monitor station transactions unless the public has access to the information that supports the certifications and the "yes" and "no" answers contained in the electronic application itself. The Commission's application processing history is replete with examples of the Commission moving toward absolute certifications on applications comprised of "yes" and "no" answers, only to discover that applicants do not take such certifications seriously.

31. A huge regulatory burden was placed upon the Commission's hearing processes in the early 1980s due to the Commission's change from an information based financial showing

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<sup>2/</sup> By having the application available through an independent contractor in Washington, the FCC assumes no responsibility for a review of the information contained in such files unless and until someone brings such information to the Commission's attention in either the filing of a Petition to Deny or an Informal Objection. Thus, the Commission's processes will be streamlined by allowing for the electronic filing of applications that may be quickly processed. At the same time, however, the public's access to documents and supplementary materials is not destroyed by the Commission's original proposal of having sales agreements and supplementary materials only available in thousands of disparate locations across the United States.

on new applications to a mere certification. Several years later, the Commission backtracked and determined that it was necessary to seek more, rather than less, information in its application forms regarding a new applicant's financial qualifications. Likewise, the Commission's certification process was undermined when it discovered that a substantial number of applicants did not have reasonable assurance of a transmitter site to build a new facility once a construction permit was granted even though applicants certified in the applications that they did. Again, the Commission backtracked and required more application information in order to be able to ascertain the validity of the certification.

32. In both of the examples above, it was not the Commission that carried the burden of validating the certifications once more information was given. Rather, it was the public, other applicants, licensees and lawyers who bore that burden. They were able to perform this function because the Commission required that at least some information supporting this certification was required to be filed with the application. And that information was available in Washington, D.C.

33. In the context of the assignment and transfer application, and the application for new stations, there are a number of issues that, in many instances, still merit close scrutiny. The radio multiple ownership study, for instance, is still not a precise science capable of easy computation by all licensees and practitioners. The public should be able to review such showings. In addition, questions of multiple ownership, attribution,

and cross-interest are also subject to interpretation and debate.<sup>8/</sup>

34. With electronic filing, the FCBA does not dispute that the Commission needs to request "yes" or "no" answers in order to be able to expeditiously process an uncontested application. At the same time, however, the Commission should not hinder the public's ability to be able to validate those certifications in circumstances where such is necessary. In assignment and transfer applications in particular, there are so many permutations of ownership, debt, equity and ownership arrangements now available and which will be available in the future, the public's oversight of these proposed transactions is important if the Commission will be performing no oversight of these agreements and arrangements. But the public cannot perform its oversight function unless such information is available to the public. This information should be available both in an applicant's or licensee's public inspection file, as well as on file at a central location in Washington, D.C.<sup>9/</sup>

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<sup>8/</sup> The FCBA notes the extensive worksheet that the Commission has provided for determining attribution of interests for multiple ownership purposes. However, the FCBA notes that many of the standards provided in that worksheet are ones which are not currently part of the Commission's rules, but have instead only been proposed as part of the ongoing Attribution Rulemaking proceeding. The FCBA trusts that the worksheet was meant to be illustrative, and was not meant to substantively change the attribution standards.

<sup>9/</sup> Included in this information that should be available to the public both in the local public file and at a central location in Washington, D.C. is information on multiple ownership. Without this background information, it will be almost impossible for the public to participate in commenting upon ownership combinations that are in violation of the Commission's rules or policies.

35. Irrespective of whether the Commission orders that sales agreements, application supporting information and worksheets be filed somewhere in Washington, D.C. as well as in the local public file, for broad public interest reasons the Commission should require on the electronic application form itself a station's sales price in a long form FCC Form 314 or 315 assignment or transfer application. Banks, lending, investment and other financial institutions have relied upon the Commission's collection of this information in providing the financial support of the broadcasting industry. Unlike other industries in which the value of a business is dependant in large measure on the value of tangible assets such as property and inventory, the broadcast industry has a value that is dependant on multiples of cash flow, and such multiples change from time to time based on the amount investors are willing to pay for stations at that time. Financial institutions have made broad use of the sales price data to track broadcast industry values to make the determination as to the extent to which these institutions can support the industry financially. Many loans, particularly to small businesses, minorities, start-up companies and women, would not have been made absent this sales price data. Accordingly, the FCBA requests that the Commission continue to recognize the public interest benefits in requiring sales price data to be part of all long form electronically filed assignment and transfer applications.<sup>10/</sup>

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<sup>10/</sup> The FCBA notes that the draft application form appended to the NPRM does not request such sales price data. Given the  
(continued...)

### **Enforcement and Audits.**

36. The FCBA is in favor of strong enforcement of the Commission's rules and policies. In the alternative, if particular rules are not to be enforced, the public should be made aware of such a policy of nonenforcement by the FCC. The FCBA is concerned that the Commission's electronic filing proposal may invite a situation where certain application rules are implicitly not enforced leading to a widespread civil disobedience by Commission applicants and licensees. This is neither in the public interest nor in the private interest of Commission regulatees, as Commission applicants and licensees should not have to guess which rules will or will not be enforced.

37. To prevent applicant and licensee civil disobedience from occurring, the Commission should institute a formal program of audits to ensure that applicants are complying with the Commission's Rules. While applications to be audited should be chosen at random, a fixed multiple of applicants should be audited, such as every 30th application submitted to the Commission. If an applicant has a minuscule chance of being audited (i.e. 1 in 100 or less), then applicants may be led to believe that their chances of being audited are so small that compliance with Commission Rules becomes a secondary issue.

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<sup>10/</sup> (...continued)

complexity of some sales contracts, the FCBA suggests that the electronic application ask the question as follows in the Assignee/ Transferee portion of the application:

"State the total sales price in dollars, or otherwise concisely describe the consideration delivered or to be delivered to Assignor or Transferor(s): \$ \_\_\_\_\_".

38. The Commission notes that under the Communications Act, it has the obligation to ensure that licensees continue to serve the public interest and comply with the Commission's Rules. Therefore, the FCBA supports a procedure of audits where no less than every 30th application filed with the Commission is fully audited. It can be expected that such an audit will require the submission of all background information supporting each certification, including the supplemental worksheets as signed by the applicant, the sales agreement and all ancillary documents, and any other information the Commission requests in order to validate each application answer.

**Conclusion.**

39. The FCBA, whose members regularly practice before the FCC, take seriously their role as advocates and advisers to Commission licensees and applicants. In that role, while supporting the lessening of the Commission's burden of processing applications, it also firmly supports the notion that the integrity of Commission processes should not be compromised by any of the proposed electronic filing procedures. Therefore, it supports the procedures enumerated above.

Respectfully submitted,

**THE FEDERAL COMMUNICATIONS  
BAR ASSOCIATION**

By: Lawrence Roberts by JRS  
Lawrence Roberts  
President-Elect

**MASS MEDIA PRACTICE COMMITTEE**

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